

FILED

MAR 28 2016

CLERK, U.S. DISTRICT COURT

By Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:16-MJ-169

ASHLEIGH LYN ALLEN	(01)
BRIAN MATTHEW BROWN	
a/k/a "Downtown"	(02)
WILLIAM RANDY CRISP	
a/k/a/ "Randy Crisp"	(03)
JEFFREY BLAKE ELLIS	
a/k/a "Jealous"	(04)
HOLLY LEANNE FRANTZEN	(05)
NIKIE NICOLE FRYE	(06)
MICHAEL SEAN GOSS	
a/k/a "Killer"	(07)
JAKE LINDSEY HARDIN	
a/k/a "Cash"	(08)
KEVIN KYLE KILLOUGH	
a/k/a "Kilo"	(09)
JAMES MARCUS LAXSON	
a/k/a/ "Monster"	(10)
TIMOTHY ERIC NIMERFROH	
a/k/a "Kaos"	(11)
SARAH SUEANNE RAGSDALE	(12)
LONNIE LEE ROTENBERRY	
a/k/a "Thowed Off"	(13)
MELISSA MAE SHERMAN	
a/k/a "Littler Bit"	(14)
JERI ANN WEILER	(15)

SEAL
UNTIL WARRANT EXECUTED

CRIMINAL COMPLAINT

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2015, and continuing until on or about April 1, 2016, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Ashleigh Lyn Allen**, **Brian Matthew Brown**, also known as Downtown, **William Randy Crisp**, also known as Randy Crisp, **Jeffrey Blake Ellis**, also known as Jealous, **Holly Leanne Frantzen**, **Nikie Nicole Frye**, **Michael Sean Goss**, also known as Killer, **Jake Lindsey Hardin**, also known as Cash, **Kevin Kyle Killough**, also known as Kilo, **James Marcus Laxson**, also known as Monster, **Timothy Eric Nimerfroh**, also known as Kaos, **Sarah Sueanne Ragsdale**, **Lonnie Lee Roternberry**, also known as Thrown Off, **Melissa Mae Sherman**, also known as Littler Bit, and **Jeri Ann Weiler**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B), namely to possess with intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of Methamphetamine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 846 (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)).

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I. INTRODUCTION

1. I have been a Special Agent of the DEA for approximately 17 years. I received basic investigative instruction at the DEA Academy located in Quantico, Virginia, and additional continuing instruction regarding investigative techniques. I am currently assigned to the Fort Worth Resident Office (FWRO) of the DEA, Dallas Field Division, working with Investigators and Officers from the Fort Worth Police Department.
2. I have participated as a law enforcement officer in several investigations of unlawful narcotics distribution and have conducted wiretap investigations, physical and electronic surveillances, undercover transactions, the execution of search and arrest warrants, debriefings of informants, and review of taped conversations and drug records.

Through my training, education and experience, I have become familiar with the manner in which illegal drugs are transported, stored and distributed, and the methods of payments for such drugs. I am also familiar with some of the methods by which narcotics traffickers communicate and code words commonly used by narcotics traffickers.

II. SUMMARY OF PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

3. As part of the conspiracy, not every person named or identified in the conspiracy knew every other person identified as being in the conspiracy. It was their joining together for the common purpose of possessing and distributing methamphetamine, the nature of the scheme to possess and distribute methamphetamine, and the overlapping among its members in possessing and distributing methamphetamine that established their membership in this particular conspiracy. And not every member of the conspiracy knew the details of each aspect of the conspiracy. Nevertheless, each member of the conspiracy knew or was aware of the conspiracy's general purpose and scope, which was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere, between and among the named conspirators and others not named.

4. As part of the conspiracy, its members had a fluid hierarchy that evolved over time. For example, as some members were arrested or otherwise temporarily unavailable, other members took over the receipt and delivery of methamphetamine.

5. Since approximately 2014, the government has been investigating allegations that **Ashleigh Lyn Allen, Brian Matthew Brown**, also known as Downtown, **William Randy Crisp**, also known as Randy Crisp, **Jeffrey Blake Ellis**, also known as Jealous, **Holly Leanne Frantzen, Nikie Nicole Frye, Michael Sean Goss**, also known as Killer, **Jake Lindsey Hardin**, also known as Cash, **Kevin Kyle Killough**, also known as Kilo, **James Marcus Laxson**, also known as Monster, **Timothy Eric Nimerfroh**, also known as Kaos, **Sarah Sueanne Ragsdale, Lonnie Lee Roternberry**, also known as Throwed Off, **Melissa Mae Sherman**, also known as Littler Bit, and **Jeri Ann Weiler**, along with Alisha Feeney, Chance Brooks, Shauna Lynn Vickers, and Gavin Seguin, not named as defendants herein, and others not named have conspired together to possess methamphetamine with the intent to distribute it in the Northern District of Texas and elsewhere.

6. As part of the conspiracy, **Ashleigh Lyn Allen, Brian Matthew Brown**, also known as Downtown, **William Randy Crisp**, also known as Randy Crisp, **Jeffrey Blake Ellis**, also known as Jealous, **Holly Leanne Frantzen, Nikie Nicole Frye, Michael Sean Goss**, also known as Killer, **Jake Lindsey Hardin**, also known as Cash, **Kevin Kyle Killough**, also known as Kilo, **James Marcus Laxson**, also known as Monster, **Timothy Eric Nimerfroh**, also known as Kaos, **Sarah Sueanne Ragsdale, Lonnie Lee Roternberry**, also known as Throwed Off, **Melissa Mae Sherman**, also known as Littler Bit, and **Jeri Ann Weiler**, agreed to possess methamphetamine with the intent to distribute it, and knowingly and willfully participated in that agreement.

7. As part of the conspiracy, the common purpose between and among **Ashleigh Lyn Allen, Brian Matthew Brown**, also known as Downtown, **William Randy Crisp**, also known as Randy Crisp, **Jeffrey Blake Ellis**, also known as Jealous, **Holly Leanne Frantzen, Nikie Nicole Frye, Michael Sean Goss**, also known as Killer, **Jake Lindsey Hardin**, also known as Cash, **Kevin Kyle Killough**, also known as Kilo, **James Marcus Laxson**, also known as Monster, **Timothy Eric Nimerfroh**, also known as Kaos, **Sarah Sueanne Ragsdale, Lonnie Lee Roternberry**, also known as Throwed Off, **Melissa Mae Sherman**, also known as Littler Bit, and **Jeri Ann Weiler**, along with others was to possess and distribute methamphetamine in the Northern District of Texas and elsewhere.

8. As part of the conspiracy, in general, **Brian BROWN, Jeffrey Blake ELLIS, Holly Leanne FRANTZEN, Kevin Kyle KILLOUGH, and Sarah Sueanne RAGSDALE** distributed methamphetamine to Alisha Feeney, Chance Brooks, and Gavin Seguin who then re-distributed or brokered methamphetamine transactions between and amongst **Ashleigh ALLEN, William Randy CRISP, Nikie Nicole FRYE, Michael Sean GOSS, Jake Lindsey HARDIN, James Marcus LAXSON, Timothy Eric NIMERFROH, Lonnie Lee ROTENBERRY, Melissa Mae SHERMAN, and Jeri Ann WEILER.**

9. As part of the conspiracy, its members routinely received and delivered ounce and multi-ounce quantities of methamphetamine that they then distributed to others in the Northern District of Texas and elsewhere.

10. As part of the conspiracy, some of the money derived from the sale and distribution of methamphetamine would be used to purchase additional quantities of methamphetamine.

III. FACTS ESTABLISHING PROBABLE CAUSE THAT A VIOLATION OF 21 U.S.C. § 846 HAS OCCURRED

11. Below is a chronology of some relevant events:

- a. On January 8, 2015, **Ashleigh Lyn ALLEN** spoke with Agents/Officers from Homeland Security during which **she** admitted to participating in the drug conspiracy. Specifically, **ALLEN** said that **Nikie Nicole FRYE** had introduced her (**ALLEN**) to Chance Brooks for the purpose of purchasing methamphetamine from Chance Brooks. **ALLEN** also admitted to agreeing to purchase approximately eight (8) ounce methamphetamine from Chance Brooks, but that the transaction never occurred.
- b. On February 2, 2015, Officers with the White Settlement Police Department arrested Chance Brooks and Shauna Lynn Vickers in possession of approximately 21.5 gross grams of methamphetamine. Chance Brooks was later arrested on June 16, 2015, on an outstanding Federal Arrest Warrant.
- c. On February 11, 2015, Agents/Officers from Homeland Security seized a drug ledger from **Holly Leanne FRANTZEN** that contained handwritten notes detailing methamphetamine distribution.
- d. On March 17, 2015, Agents/Officers with Homeland Security and the Fort Worth Police Department executed a search warrant at the residence of Rachel Adams, located at 1002 Cotton Wood Dr., Benbrook, Texas, and arrested Gavin Seguin.
- e. On March 29, 2015, Officers from the Kennedale Police Department arrested **James Marcus LAXSON** and **Sarah Sueanne RAGSDALE** in possession of a small amount of methamphetamine.
- f. On April 29, 2015, Officers from the Fort Worth Police Department arrested Laci Whisenant in possession of approximately 392 grams of methamphetamine.

- g. On June 15, 2015, Agents/Officers from the Drug Enforcement Administration and the Parker County Special Crimes Unit arrested Christina Pugh on an outstanding Federal Arrest Warrant.
 - h. On June 16, 2015, Agents/Officers from the Drug Enforcement Administration and Homeland Security arrested Alisha Feeney.
12. Co-conspirator Alisha Feeney identified **Ashleigh Lyn ALLEN** as one of her (Feeney's) methamphetamine customers. Specifically, Alisha Feeney said that on at least four occasions in 2014, she and Chance Brooks supplied **Ashleigh Lyn ALLEN** with half-ounce and ounce quantities of methamphetamine. On January 8, 2015, **Ashleigh Lyn ALLEN** admitted to receiving methamphetamine from Feeney and Chance Brooks.
13. A cooperating defendant (hereinafter CD1) identified **Brian Matthew BROWN** as a methamphetamine distributor who had distributed approximately 357 ounces of methamphetamine cumulatively to him (the CD1) in 2013-14. Co-conspirator Alisha Feeney confirmed that **BROWN** was a methamphetamine distributor who had distributed approximately 213 ounces of methamphetamine cumulatively to her and others in 2013-2014.
14. Co-conspirator Laci Whisenant identified **William Randy CRISP** as a methamphetamine distributor to whom she (Whisenant) had distributed one ounce-quantities of methamphetamine to in 2014. Co-conspirator Alisha Feeney confirmed that **CRISP** was involved in distributing methamphetamine. Specifically, Feeney said that in 2014, her and **CRISP** sold methamphetamine back and forth between each other depending on who had the steadier methamphetamine source.

15. Co-conspirator Alisha Feeney also identified **Jeffrey Blake ELLIS** as a methamphetamine distributor whom she (Feeney) had observed on approximately ten (10) occasions supply **Lonnie Lee ROTTENBERRY** with two (2) ounce quantities of methamphetamine, and on an additional six (6) occasions she observed **ELLIS** supply **ROTTENBERRY** with one (1) ounce quantities of methamphetamine. Co-conspirator Christina Pugh informed Agents/Officers that she and her boyfriend had supplied **ELLIS** with four (4) ounce quantities of methamphetamine for a total of approximately 120 ounces of methamphetamine. Additionally, Christina Pugh said that on one (1) occasion she had observed her boyfriend trade four (4) ounces of methamphetamine to **ELLIS** for a 9mm pistol.

16. CD1 identified **Holly Leanne FRANTZEN** as a methamphetamine distributor whom he (CD1) had observed on multiple occasions in possession of multi-ounce quantities of methamphetamine. Co-conspirator Alisha Feeney confirmed that **FRANTZEN** was involved in distributing methamphetamine. Specifically, Feeney said that **FRANTZEN** had supplied Feeney and others with hundreds of ounces cumulatively of methamphetamine before she (Feeney) was arrested.

17. CD1 also identified **Nikie Nicole FRYE** as a methamphetamine distributor to whom he (CD1) had supplied with approximately 41 ounces cumulatively of methamphetamine before he was arrested. Co-conspirator Alisha Feeney confirmed that **FRYE** was involved in distributing methamphetamine.

Specifically, Feeney said that she (Feeney) had observed **FRYE** supply others with multi ounce quantities of methamphetamine.

18. CD1 also identified **Michael Sean GOSS** as a methamphetamine distributor whom he (CD1) had observed supply another person with approximately four ounces of methamphetamine in or around March 2015. Co-conspirator Alisha Feeney confirmed that **GOSS** was involved in distributing methamphetamine. Specifically, Feeney said that on at least 30 different occasions she (Feeney) had supplied **GOSS** with ounce and multi ounce quantities of methamphetamine before she (Feeney) was arrested.

19. Co-conspirator Alisha Feeney identified **Jake Lindsey HARDIN** as a methamphetamine distributor to whom she (Feeney) had supplied multi ounce quantities of methamphetamine. Co-conspirator Chance Brooks confirmed that **HARDIN** was involved in distributing methamphetamine. Specifically, Brooks said that on approximately twenty (20) occasions, he (Brooks) had observed **HARDIN** in possession of four (4) ounce quantities of methamphetamine.

20. Co-conspirator Alisha Feeney identified **Kevin Kyle KILLOUGH** as a methamphetamine distributor whom she (Feeney) had partnered with on at least six (6) occasions to supply methamphetamine customers with one-pound quantities of methamphetamine before she (Feeney) was arrested. And a cooperating witness (hereinafter CW) said that on approximately four (4) occasions the CW had observed **KILLOUGH** in possession of four (4) ounce quantities of methamphetamine.

21. Co-conspirator Alisha Feeney identified **James Marcus LAXSON** and **Sarah Sueanne RAGSDALE** as partners in the methamphetamine distribution business whom she (Feeney) and **Brian Matthew BROWN** had on at least ten (10) occasions supplied with one (1) and two (2) ounce quantities of methamphetamine. Co-conspirator Gavin Seguin confirmed that **RAGSDALE** was involved in distributing methamphetamine. Gavin Seguin said that on approximately eight (8) occasions he (Seguin) had supplied **RAGSDALE** with one (1) ounce quantities of methamphetamine. And cooperating codefendant-2 (CD2) confirmed that **KILLOUGH** was involved in distributing methamphetamine. CD2 said that on multiple occasions he (CD2) had supplied **KILLOUGH** with multi ounce quantities of methamphetamine.

22. Co-conspirator Alisha Feeney identified **Timothy Eric NIMERFROH** as a methamphetamine distributor whom she (Feeney) had observed supply others with two (2) ounce quantities of methamphetamine. CD confirmed that **NIMERFROH** was involved in distributing methamphetamine. CD1 stated that on one (1) occasion, he had observed **Timothy Eric NIMERFROH** in possession of approximately four (4) pounds of methamphetamine.

23. Co-conspirator Alisha Feeney identified **Lonnie Lee ROTENBERRY** as a methamphetamine distributor whom she (Feeney) had supplied with a total of twelve (12) ounces of methamphetamine and on an additional six (6) occasions, she observed **Jeffrey Blake ELLIS** supply **ROTTENBERRY** with one (1) ounce quantities of methamphetamine.

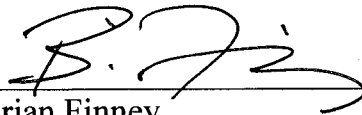
Co-conspirator Gavin Seguin confirmed that **ROTENBERRY** was involved in the distribution of methamphetamine. Seguin said that on at least (15) occasions, he (Seguin) had supplied **ROTENBERRY** with either one (1) or two (2) ounce quantities of methamphetamine.

24. Co-conspirator Alisha Feeney identified **Melissa Mae SHERMAN** as a methamphetamine distributor whom she (Feeney) had supplied with four (4) ounce quantities of methamphetamine. CD1 confirmed that **SHERMAN** was involved in distributing methamphetamine. CD1 also said that on a daily basis over a several month period he observed **SHERMAN** supply multi ounce quantities of methamphetamine to her customers.

25. Co-conspirator Alisha Feeney identified **Jeri Ann WEILER** as a methamphetamine distributor whom she (Feeney) had purchase between one (1) and four (4) ounce quantities of methamphetamine. CD2 confirmed that **WEILER** was involved in distributing methamphetamine. CD2 also said that on approximately ten (10) occasions, he (CD2) had supplied **WEILER** and her boyfriend, Brian Zimmerman, with one (1) ounce quantities of methamphetamine.

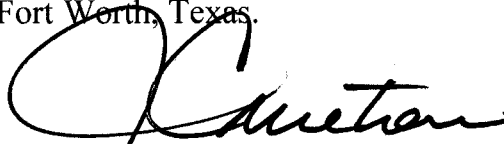
26. Based on the foregoing, the Complainant believes that probable cause exists that **Ashleigh Lyn Allen, Brian Matthew Brown**, also known as Downtown, **William Randy Crisp**, also known as Randy Crisp, **Jeffrey Blake Ellis**, also known as Jealous, **Holly Leanne Frantzen, Nikie Nicole Frye, Michael Sean Goss**, also known as Killer, **Jake Lindsey Hardin**, also known as Cash, **Kevin Kyle Killough**, also known as Kilo,

James Marcus Laxson, also known as Monster, **Timothy Eric Nimerfroh**, also known as Kaos, **Sarah Sueanne Ragsdale**, **Lonnie Lee Roternberry**, also known as Thrown Off, **Melissa Mae Sherman**, also known as Littler Bit, and **Jeri Ann Weiler**, along with others both known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(B), namely to distribute and to possess with intent to distribute more than 50 grams of methamphetamine, in violation of 21 U.S.C. § 846.



Brian Finney
Special Agent
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 10:48 ~~am~~ ^{pm}, this 28th day of March, 2016, in Fort Worth, Texas.



JEFFREY L. CURETON
United States Magistrate Judge